

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

BARBARA KNAPKE, individually and on
behalf of all other similarly situated,

Plaintiff,

v.

PEOPLECONNECT, INC., a Delaware
Corporation,

Defendant.

NO. 2:21-cv-00262-MJP

JOINT MOTION AND ORDER TO
EXTEND DEADLINES

NOTED ON MOTION CALENDAR:
Thursday, September 9, 2021

The Parties, by and through their attorneys, respectfully move for a 30-day extension of the Parties' discovery deadlines. In support of this Motion, the Parties state as follows:

1. On August 10, 2021, this Court denied Defendant PeopleConnect, Inc. ("Defendant")'s Motion to Dismiss. (ECF No. 25.)

2. On August 17, 2021, this Court entered an Order Regarding Initial Disclosures, Joint Status Report, and Early Settlement. (ECF No. 26.) This order set the following dates:
Deadline for FRCP 26(f) Conference: 9/14/2021; Initial Disclosures Pursuant to FRCP 26(a)(1): 9/21/2021; Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f): 9/28/2021.

3. On August 20, 2021, Defendant filed a Notice of Appeal (ECF No. 27), and a Motion to Stay Proceedings Pending Appeal of the Court's Decision to Deny Defendant's Motion to Compel Arbitration in which Defendant requested the Court stay all proceedings in this case until the Ninth Circuit rules on its appeal.¹ (ECF No. 28.) Plaintiff Barbara Knapke ("Plaintiff") will oppose the Motion to Stay Pending Appeal on or before her deadline of September 13, 2021.

4. The Parties (both Plaintiff and Defendant) agree that it is in the best interests of the case, primarily for the purposes of efficiency, to agree to halt discovery obligations for a brief period of time while the Court evaluates the Motion to Stay Pending Appeal. The Parties thus agree that a 30-day extension of all above-referenced discovery deadlines is appropriate given the pending Motion to Stay Pending Appeal.

5. The Parties, therefore, jointly request a 30-day extension of all discovery deadlines. This would extend the deadlines for FRCP 26(f) Conference from 9/14/2021 to 10/14/2021; the deadline for Initial Disclosures Pursuant to FRCP 26(a)(1) from 9/21/2021 to 10/21/2021; and the deadline for Combined Joint Status Report and Discovery Plan as Required by FRCP 26(f) and Local Civil Rule 26(f) from 9/28/2021 to 10/28/2021.

WHEREFORE, for the reasons stated herein, the Parties respectfully request that the Court grant this motion and enter an Order extending all pending discovery deadlines 30 days.

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¹ Defendant's answer will be due 14 days after the Court rules on the Motion to Stay Pending Appeal. (ECF No. 31.)

DATED this 9th day of September, 2021.

PEOPLECONNECT, INC.

BARBARA KNAPKE

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Attorneys for Defendant PeopleConnect, Inc.

IT IS SO ORDERED.



MARSHA J. PECHMAN

UNITED STATE SENIOR DISTRICT JUDGE

DATE: September 13, 2021